

# EXHIBIT B

Deposition of  
**Jason W. Beaman, D.O., M.S., M.P.H., FAPA**  
September 30, 2021

Dillard  
vs.  
City of Springdale



**Jason W. Beaman, D.O., M.S., M.P.H., FAPA**

**Dillard vs.  
City of Springdale**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF ARKANSAS  
3                   FAYETTEVILLE DIVISION  
4       JILL DILLARD, JESSA SEEWALD, JINGER                   ) Case No.  
      VUOLO, and JOY DUGGAR                                ) 5:17-CV-05089-TLB  
5    )  
      Plaintiffs,    )  
6    )  
      vs.    )  
7    )  
      CITY OF SPRINGDALE; WASHINGTON COUNTY;                )  
8       KATHY O'KELLEY; ERNEST CATE; RICK HOYT;             )  
      STEVE ZEGA; BAUER PUBLISHING COMPANY,                 )  
9       L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA             )  
      GROUP, INC.; BAUER, INC; HEINRICH BAUER                )  
10      NORTH AMERICA, INC; BAUER MEDIA GROUP                )  
      USA, LLC; and DOES 1-10, inclusive,                    )  
11    )  
      Defendants.   )  
12    )

13           DEPOSITION OF JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA  
14                               via Zoom videoteleconference  
15                               Thursday, September 30, 2021  
16  
17

18                               REPORTED BY: Derek L. Hoagland  
19   CSR No. 13445  
20   Job No. 10089281  
21  
22  
23  
24  
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      USA, LLC; and DOES 1-10, inclusive,                    )  
11   )  
      Defendants.   )  
12   )  
   )

13  
14  
15       Deposition of JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA,  
16       taken before Derek L. Hoagland, a Certified Shorthand  
17       Reporter for the State of California, commencing at  
18       9:09 a.m., Thursday, September 30, 2021, via Zoom  
19       videoteleconference.  
20  
21  
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23  
24  
25

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1

[REDACTED]

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

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1

[REDACTED]

## Dillard vs. City of Springdale

Category	Percentage
1	100
2	95
3	98
4	100
5	45
6	85
7	95
8	93
9	98
10	75
11	100
12	45
13	100
14	85
15	20
16	95
17	98
18	80
19	90
20	98
21	95
22	85
23	98
24	95
25	85
26	95
27	98
28	95

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 Q. Okay. Now, going back to page 8 of Exhibit 34,  
18 under No. 2, it goes on to read:

19 "Dr. Wynne agreed that she over-reported. He  
20 just believed that she did it as a cry for help."

21 Do you see that?

22 A. Yes.

23 Q. So No. 2, because it's not up, but I remember  
24 seeing that -- oh, it's still on the screen. Can you  
25 see it on the screen?

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1       that be being exposed to sexual violence?

2       A.       It would be -- I'm sorry.

3               Can you repeat your question?

4       Q.       Sure. If someone re-experiences sexual  
5       violence, is that tantamount to experiencing sexual  
6       violence?

7       A.       Well, they experience the sexual violence to  
8       begin with, so it would be an extenuation of the sexual  
9       violence that they initially had.

10      Q.       How traumatic is re-experiencing sexual  
11      violence?

12      A.       That certainly depends on the individual and the  
13      circumstances regarding that assault.

14      Q.       The criteria in Section A says:  
15               "Exposure to actual or threatened," and it goes  
16      on to say, "sexual violence."

17               Do you see that?

18      A.       I do.

19      Q.       How would you compare re-experiencing sexual  
20      violence to exposure to actual or threatened sexual  
21      violence?

22      A.       I would find it to be an extenuation of the  
23      sexual violence.

24      Q.       What do you mean when you say an extenuation of  
25      the sexual violence?

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1       A.       That someone is sexually assaulted and there's  
2       trauma associated with that, and if they reexperience  
3       that through reminders or something like that, it is an  
4       extenuation of the sexual violence that they had. It's  
5       a -- it's part of that initial sexual assault.

6       Q.       What is the definition of sexual trauma, if you  
7       know? And, frankly, we can put it up on the screen. I  
8       don't mean to -- this doesn't need to be a memory  
9       contest. I don't want to be unfair. Let's do that.  
10      Let me withdraw the question.

11             We are going to put something up on the screen,  
12      an exhibit. Hang on. It's going to take me a minute to  
13      find my copy of this exhibit.

14             All right. I will represent to you that we have  
15      put up the definition of sexual trauma as found in the  
16      American Psychological Association Dictionary of  
17      Psychology.

18             Do you see that?

19      A.       I do.

20      Q.       Do you know what the American Psychological  
21      Association Dictionary of Psychology is?

22      A.       No.

23      Q.       Okay. Well, we'll go forward anyways.

24             Do you see in the American Psychological  
25      Association Dictionary of Psychology that the definition

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA ) ss.

I, DEREK L. HOAGLAND, CSR #13445, State of California,  
do hereby certify:

That prior to being examined, the witness named in the  
foregoing proceeding was by me sworn to testify to the  
truth, the whole truth and nothing but the truth;

That said proceeding was taken down by me by stenotype  
at the time and place therein stated and thereafter  
transcribed under my direction into computerized  
transcription.

I further certify that I am not of counsel nor attorney  
for nor related to the parties hereto, nor am I in any  
way interested in the outcome of this action.

Further, that if the foregoing pertains to  
the original transcript of a deposition in a federal  
case, before completion of the proceedings, review of  
the transcript [ X ] was [ ] was not requested.

In compliance with section 8016 of the Business and  
Professions Code, I certify under penalty of perjury  
that I am a certified shorthand reporter with license  
number 13445 in full force and effect.

Witness my hand this October 15, 2021.



DEREK L. HOAGLAND, CSR #13445